

Exhibit 1

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

BENTHOS MASTER FUND, LTD.,

Petitioner,

-v-

AARON ETRA,

Respondent.

Case No. 20-CV-03384 (AJN)

**RESPONDENT'S RESPONSE
TO BENTHOS MASTER FUND'S
SUBPOENA FOR
PRODUCTION OF DOCUMENTS**

I, Aaron Etra, respondent, respond below to Benthos Master Fund's Subpoena calling for Production of Documents for the period from August 1, 2018 to August 27, 2020, and certify the documents are genuine copies and have been obtained in the normal course of business:¹

Documents Subpoenaed

1. All documents concerning the nature, extent, and location of all assets owned or controlled by You, including those which detail the valuation of any assets owned or controlled by You. I OWN NO CAR, NO OTHER CONVEYANCES, NO HOMES OR OTHER COMMERCIAL, RESIDENTIAL OR INDUSTRIAL BUILDINGS OR INTERESTS IN THEM. I ONLY OWN MY HOUSEHOLD AND PERSONAL EFFECTS IN MY RENTAL APARTMENT AT 240 EAST 47TH STREET, NEW YORK, NY 10017 FOR WHICH I HAVE NO DOCUMENTS.

2. All documents concerning Your direct and indirect ownership interests in any business or entity of any kind. ATTORNEY REGISTRATION CERTIFICATE ATTACHED

3. All documents, including but not limited to all monthly statements since August 1, 2018, concerning any bank accounts, brokerage accounts, investment accounts, checking accounts, savings accounts, and all other accounts, whether in the United States or another country, in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons. ATTACHED

4. All documents, including but not limited to all monthly statements since August 1, 2018,

¹ When a document is requested in multiple numbers, that document is attached only once and applies to the others.

concerning any credit cards in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons. ATTACHED

5. All documents concerning assets (including real property and interests in any other entity) and any bank accounts of Investors & Developers Associates Inc. ("INDEVA"), and any other corporation or other entity controlled by You since August 1, 2018. NONE

6. All documents relating to any real property, including leases for real property, in which You, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, have any interest, directly or indirectly. ATTACHED

7. All documents concerning any stocks or securities owned by You, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons. ATTACHED

8. All documents concerning any securities owned by You, including but not limited to stock or interests in publicly or privately held companies, options, derivatives, futures, debt, bonds and/or debentures. ATTACHED

9. All documents concerning any safe deposit boxes or other depositories ever maintained by You. NONE

10. All documents concerning any and all actual, proposed and/or contemplated investments by You and all direct and indirect ownership interests in any entity, and the amount of income received by You from these investments and ownership interests since August 1, 2018. NONE

11. All documents concerning all proposed and actual purchases by any person or entity of any asset or property owned or controlled by You, and all proposed and actual purchases by You of any asset or property owned by any person or entity. NONE

12. All documents concerning (i) any loans, lending commitments, advances or lines of credit ever made, extended or received by You, (ii) the names and addresses of the parties to the

loans, lending commitments, advances or lines of credit, (iii) the amount of the loans, lending commitments, advances or lines of credit, (iv) all contractual terms and obligations relating thereto, and (v) any repayments of loans, lending commitments, advances or lines of credit made by or to You, the date and amount of the repayment, and the parties paying and receiving the repayment.

NONE

13. All documents concerning any current debts You have other than the one owed to Benthos Master Fund, Ltd., including those which evidence (i) the amount and date of the original indebtedness, (ii) the name and address of the creditor, (iii) the basis for the indebtedness, and (iv) the amount and date of any sum repaid by You since the original indebtedness. ATTACHED (ALSOP UNPAID RENT)

14. All documents concerning any other debts You have paid off in whole or in part, including those which evidence (i) the amount and date of the original indebtedness, (ii) the name and address of the creditor, (iii) the basis for the indebtedness, and (iv) the amount and date of any sum repaid by You since the original indebtedness. NONE

15. All documents concerning all persons and entities that are indebted to You, including without limitation those which evidence (i) the amount and date of the original indebtedness, (ii) the name and address of the debtor, (iii) the basis for the indebtedness, and (iv) the amount and date of any sum repaid by the debtor since the original indebtedness. NONE

16. All documents concerning all proposed and actual transfers, conveyances, assignments, leases, sales or other dispositions of property, assets, cash, stock, membership interests and/or any other consideration by You to any employee or representative of You, including, but not limited to those evidencing (i) the nature, date, recipient, and amount of the transfer, conveyance, assignment, lease, sale or other dispositions, and (ii) the repayment of advances and the satisfaction of judgments and any other obligations or claims of any nature. NONE

17. All documents concerning all other proposed and actual transfers, conveyances, assignments, leases, sales or other dispositions of property, assets, cash, stock, membership interests and/or any other consideration by You to any person or entity, and from any person or entity to You, including, but not limited to those evidencing (i) the nature, date, recipient, and amount of the transfer, conveyance, assignment, lease, sale or other dispositions, and (ii) the repayment of advances and the satisfaction of judgments and any other obligations or claims of any nature. NONE

18. All documents concerning all monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged by and between You and any entity owned or controlled by You (in whole or in part), including those evidencing (i) the nature and amount of the monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged, (ii) the nature of the payment, receipt, purchase, sale, transfer or exchange, (iii) the date of the payment, receipt, purchase, sale, transfer or exchange, (iv) the payor and recipient of the monies, stock, property or other consideration, and (v) the consideration for the payment, receipt, purchase, sale, transfer or exchange. NONE

19. All documents concerning any property or money being held in trust for You, including those documents which identify the person or entity and its address holding the property or money, and the nature and amount of property or money. NONE

20. All documents concerning property or money that You have placed in trust for another person, including those documents which identify the person's address, the person's relationship to You, the nature and amount of property or money, and the date of the creation of the trust. NONE

21. All documents concerning any execution or attachment that has ever been levied against Your property, including those which identify the property seized and the suit pursuant to which the seizure took place. NONE

22. All documents concerning any motor vehicles, including but not limited to a car, SUV, motorcycle, boat, etc., in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons since August 1, 2018. NONE

23. All documents concerning any expenses, whether paid by You or by someone else on Your behalf, related to including but not limited to a car, SUV, motorcycle, boat, etc., in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons since August 1, 2018. NONE

24. All documents concerning any cash available with a value in excess of \$1,000. NONE

25. All documents concerning Your statement in an email dated August 20, 2020 that You “spent more money than I had, some \$21,000, in fighting the court battle[,]” including documents sufficient to detail all such expenses, including the bank account(s) from which any such payments were made, the recipients of such payments, and the dates of those payments. ATTACHED

26. All documents concerning all legal fees and expenses that You have paid since August 1, 2018. ATTACHED

27. All documents concerning Your current residence, and any other place at which You have resided since August 1, 2018. I LIVE IN A RENTAL APARTMENT WITH NO CURRENT LEASE.

28. All documents concerning all amounts spent in connection with Your maintenance of an office space at 445 Park Avenue, 9th Floor, since August 1, 2018, including the bank account from which any such amounts were drawn. IT IS A MONTH TO MONTH RENTAL

29. All communications with any person regarding Your ability to pay expenses as they come due. NONE

30. All communications with any person regarding Your financial status, including but not limited to Your assets and liabilities and any sources of income received by You. NONE

31. All documents concerning agreements entitling You to the payment or receipt of money, property or other consideration entered, and all terms thereof. NONE

32. All documents concerning any escrow agent agreements entered into by You.
BENTHOS ESCROW AGENT AGREEMENT ONLY ONE NOW NOT
PRIVILEGED AND NOT SUBJECT TO OBJECTION

33. All documents concerning Your current employment, including but not limited to documents demonstrating the name of Your employer and the title of Your position.

ATTORNEY REGISTRATION ATTACHED

34. All documents concerning how Your monthly expenses have been paid each month since August 1, 2018. ATTACHED

35. All documents concerning Your monthly living expenses since August 1, 2018, whether paid by You or by someone else on Your behalf, including but not limited to rents, a mortgage, food costs, bills and invoices of any kind, utilities, transportation expenses, insurances, memberships and/or subscriptions, entertainment, etc. COVERED IN FINANCIAL STATEMENT SUBMITTED EAERLIER

36. All documents concerning any monthly living expenses that You currently pay for someone other than Yourself, or have paid for someone other than Yourself since August 1, 2018, including but not limited to rents, a mortgage, food costs, bills and invoices of any kind, utilities, transportation expenses, insurances, memberships and/or subscriptions, entertainment, etc.
NONE

37. All documents concerning any expenses of any type that You had paid on behalf of someone other than Yourself since August 1, 2018. NONE

38. All documents concerning any judgments in Your favor, including those which identify the judgments and the court, the index or case number, the parties involved and the date and

amount of the outstanding judgment. NONE

39. All documents concerning any judgments against You besides the one entered in this action, including those which identify the judgments and the court, the index or case number, the parties involved and the date and amount of the outstanding judgment. NONE

40. All documents concerning any examinations of You by a judgment creditor, including those which identify the judgment creditor, the action in which the examination took place, and the date of the examination. NONE OTHER THAN BETHOS

41. All documents concerning any lawsuits, currently pending or ever filed against You, in any court or arbitration tribunal. NONE OTHER THAN BENTHOS

42. All documents concerning any proposed or actual settlement of any lawsuit or arbitration involving You. NONE OTHER THAN BENTHOS PROPOSED SETTLEMENT

43. All documents concerning any deeds or evidence of ownership or any interest in real property, either directly or through an entity under Your complete or partial control. ATTACHED

44. All documents concerning any of Your interests in any lien on personal or real property. NONE

45. All documents concerning any liens, security interests, mortgages or other encumbrances against any property owned or controlled by You, including those evidencing (i) the nature of the lien, security interest, mortgage or other encumbrance, (ii) the full description and location of the property affected by the lien, security interest, mortgage or other encumbrance (including, without limitation, the location and identity of the office of the filing or recording of such lien, security interest, mortgage or other encumbrance, as well as full indexing and creditor information), and (iii) all contractual terms and obligations relating to the liens, security interests, mortgages, or other encumbrances. NONE

46. All documents concerning any and all stocks or bonds owned by You or in which You have any interest, or evidence of ownership thereof. ATTACHED

47. Copies of all State and Federal income tax returns filed by You. NOT FILED YET

48. Copies of all financial statements, formal or informal, that You have generated or that have been generated on Your behalf. NONE OTHER THAN ALREADY PROVIDED

49. All documents concerning Your banking records. This includes, but is not limited to, credit applications and records and statements for any checking, savings, money market, certificate of deposit, investments, bonds, retirement accounts, safety deposit boxes or any other financial assets maintained with any banking or financial firm or institution, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons. ATTACHED OTHER THAN OBJECTION FOR PRIVILEGE OF ACCOUNTS

50. All documents concerning any policies of insurance in which You, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, have or had an interest. NONE

51. All documents concerning any borrowing You have done against any interest in an insurance or other claim now pending. NONE

52. All documents concerning payments You have made on any premiums of any life insurance or annuities policies for any person, including those which identify the names of the insurance companies, the policy numbers, the premium amounts, and the present cash value and beneficiaries of each such policy. NONE

53. All other documents relating to Your liabilities and expenses. ATTACHED

54. All documents relating to any business, partnership, limited liability company, limited liability partnership, or any other entity in which You have any ownership interest. NONE

55. All documents concerning all purchases, sales and exchanges by You of registered and unregistered securities, membership interests, partnership interests, debt and other holdings in all entities of any kind, including, without limitation, a description of the nature, amount, value and location of the interests, debt or other holdings. NONE

56. All documents concerning any security pledged by You in connection with real property or personal property that You own (in whole or in part) or lease. NONE

57. All documents concerning any of Your property covered by a security agreement or subject to a financing statement under the Uniform Commercial Code, including those which identify the property, its value and location. NONE

58. All documents concerning whether You are a party to any action now pending in any court or arbitration tribunal not involving Benthos Master Fund, Ltd., including those which identify the action or arbitration. NONE

59. All documents concerning any loans, lending commitments, advances or lines of credit ever made, extended or received by You. NONE

Dated; January 29, 2021

/s/ Aaron Etra _____
Aaron Etra, respondent